

Jeffrey Willis, Esq.
Nevada Bar No. 4797
Wayne Klomp, Esq.
Nevada Bar No. 10109
SNELL & WILMER L.L.P.
50 West Liberty Street, Suite 510
Reno, Nevada 89501
Telephone: 775-785-5440
Facsimile: 775-785-5441
Email: jwillis@swlaw.com
wklomp@swlaw.com

*Attorneys for Plaintiffs Wells Fargo Bank, N.A. and
Federal National Mortgage Association*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WELLS FARGO BANK, N.A., a national
banking association; FEDERAL NATIONAL
MORTGAGE ASSOCIATION;

Plaintiff,

vs.

GRACIELA ZAMORA TORRES, an
individual; OCTAVIO CANO-MARTINEZ,
an individual; APACHE HILLS HOME
OWNERS' ASSOCIATION, INC., a Nevada
non-profit corporation;

Defendants.

Case No. 2:17-cv-01324-APG-BNW

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
DISPOSITIVE MOTIONS**

(First Request)

Plaintiffs Wells Fargo Bank, N.A. and Federal National Mortgage Association (the "Plaintiffs"), together with Defendant Apache Hills Home Owners' Association, Inc. ("Apache Hills" and jointly with Plaintiffs, the "Parties"), through their counsel hereby respectfully request the Court enter an order, pursuant to Local Rules IA 6-1 and 26-4, extending the dispositive motion deadlines set forth in the Scheduling Order entered on November 26, 2018 (ECF No. 23). The dispositive motion deadline in the Scheduling Order has not expired and is currently scheduled for June 19, 2019. The Parties request an extension for 60 days until Monday, August 19, 2019.

I. Good Cause for Extending Deadline for Filing Dispositive Motions

This requested extension is the result of a contingent resolution of this matter between the Parties. Plaintiffs will file an application for default judgment by June 7, 2019, against the non-appearing defendants, Graciela Zamora Torres and Octavio Cano-Martinez (“Non-appearing Defendants”). Resolution of the litigation between the Parties currently depends upon the Plaintiffs obtaining default judgment against the Non-appearing Defendants. The Clerk has already entered default against the Non-appearing Defendants (ECF No. 28), and the Parties anticipate obtaining default judgment against the Non-appearing Defendants in a timely manner. Once Plaintiffs obtain default judgment, the Parties will submit a stipulation and order dismissing the litigation.

This is the Parties’ first stipulated request to extend the deadlines. This request is not made for any deleterious purpose or to cause delay, but is made in good faith by the Parties as the result of the tentative resolution of this matter in its entirety.

II. Proposed Schedule

The Parties respectfully request that the Court extend the dispositive motion deadline by 60 days until Monday, August 19, 2019.

///

///

///

///

///

///

///

///

///

///

///

///

The Parties respectfully request that the Court grant this Stipulation and extend the dispositive motion deadline as set forth herein.

Dated: June 5, 2019

Dated: June 5, 2019

WOLF, RIFKIN, SHAPIRO,
SCHULMAN & RABKIN LLP

SNELL & WILMER L.L.P.

By: /s/ /s/ Gregory P. Kerr

By: /s/ Wayne Klomp

Douglas M. Cohen, Esq.
Nevada Bar No. 1214
Gregory P. Kerr, Esq.
Nevada Bar No. 10383
3556 E. Russell Road, 2nd Floor
Las Vegas, Nevada 89120

Jeffrey Willis, Esq.
Nevada Bar No. 4797
Wayne Klomp, Esq.
Nevada Bar No. 10109
50 West Liberty Street, Suite 510
Reno, Nevada 89501-1961

*Attorneys for Defendant Apache Hills Home
Owners' Association, Inc.*

*Attorneys for Plaintiffs Wells Fargo Bank,
N.A. and Federal National Mortgage
Association*

ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: June 6, 2019

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED: June 5, 2019.

/s/ Lara J. Taylor
An Employee of Snell & Wilmer L.L.P.